UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173

Memorandum 23 MAR 1987

SUBJECT: Request for Immediate Removal Action
West Bank Asbestos Site, Nashua, New Hampshire
ACTION MEMORANDUM

FROM: Paul R. Groulx, On-Scene Coordinator
Oil and Hazardous Materials Section

TO: Michael R. Deland, Regional Administrator
Regional Services Division

THROUGH: Edward U. Conley, Director
Environmental Services Division

Authorization is hereby requested for $650,000.00 to initiate an immediate removal action at the West Bank Asbestos Site, Nashua, New Hampshire. Implementation of this action is necessary to mitigate the immediate health threat posed to the residents and the general public by on-site and off-site migration of airborne asbestos fibers or particulates. This Action will provide an adequate cover over, removal of, and/or stabilization of exposed asbestos waste materials.

The West Bank Asbestos Site is located directly on the banks of the Merrimack River. The Merrimack River is used as a water supply source for the cities of Lowell, Lawrence, Methuen, and Andover, Massachusetts.

The State of New Hampshire Department of Health and Welfare, Division of Public Health Services, has formally requested EPA assistance based upon a determination of imminent and substantial danger to public health. It identifies the need for Federal emergency response action at the West Bank Asbestos Site.

BACKGROUND

The West Bank Asbestos Site is located in Hillsboro County, Nashua, New Hampshire. The Site is contained on a city-owned property lot between the ends of Hollis Street and Crown Street, adjacent to the Merrimack River south of the Taylor's Fall Bridge. The lot is made up of an estimated 15-foot high slope

extending along the river for approximately 1,000 feet. Asbestos baghouse and plate wastes are fully and partially exposed from below the waterline to the top edge of the slope. Large holes have eroded into the bank, creating cave-like openings where additional asbestos waste material is present. These openings indicate that the deposit extends back into the bank at least 10 feet or further. The flat area at the top of the slope is littered with deteriorating asbestos plate waste and large pieces of asbestos baghouse waste. Plate waste was also visible on the river bottom at the shore's edge.

The surrounding area consists of commercial and residential lots in a densely populated suburb of Nashua. The Site is approximately one mile from the center of downtown Nashua.

This Site is not on the National Priorities List.

THREAT

Asbestos fibers find entry into the body by inhalation and ingestion. Exposure to asbestos is associated with asbestosis, a chronic and debilitating lung disease. Exposure to asbestos is also linked to the development of mesothelioma, a form of cancer. Asbestos-related malignancies may exhibit a latency period of up to forty years. The risk of ambient exposure to asbestos is receiving increasing study, and there is growing concern that exposures to levels below the occupational standard may pose a significant risk to public health.

The West Bank Asbestos Site represents an imminent and substantial endangerment to the public health and environment in that:

1. Friable asbestos wastes are exposed to the air, providing a direct means by which asbestos fibers may enter the environment in an uncontrolled manner.

2. There are no barriers to prevent access to the Site. Consequently, the potential for exposure to humans in this mostly residential area is increased.

3. Potential receptors in the immediate area include several residences. Many young children live within the immediate area of the Site.

4. Releases will continue to occur each spring when the water level in the brook rises and washes into the deposit. Downstream transportation of the material via the surface waters of the Merrimack River makes the prediction of exposure potentially difficult.

A health advisory issued to the Region by the Agency for Toxic Substances and Disease Registry (ATSDR-previously CDC) states that this situation represents an unnecessary public health risk and a potential chronic public health hazard to persons living on or around the site (see Attachment 1, CDC Memo).

Although no actions have been taken to abate the threat of human exposure to the asbestos waste material, preliminary investigations have been completed by the ATSDR and the U.S. Environmental Protection Agency confirming the existence of asbestos waste material and a significant health threat. Also, a Comprehensive Site Investigation, including extensive sampling and surveying, was completed by the Roy F. Weston Technical Assistance Team in order to define the total extent of asbestos contamination present on the Site.

ENFORCEMENT STRATEGY

See attachment.

PROPOSED PROJECT AND COST

The anticipated response actions are to either remove the asbestos waste material in order to dispose it of properly, or to cover the exposed asbestos deposits using a stable cover as designed by the Army Corps of Engineers. A combination of removal and stabilization of the asbestos waste material is the expected remedial action to be taken. Special considerations involve the stabilization of exposed asbestos along the steep slopes and along the eroding bank of the Merrimack River. This removal action is consistent with the long range remedy for the Site.

Major project tasks and costs include:

1.	United States Army Corps of Engineers (IAG) A. Design and Engineering B. Supervision and Administration of Cleanup Actions	$507,000
2.	Intramural Costs	$ 40,000

3.	TAT Costs - Field Monitoring/Technical Assistance	103 ~~$100~~,000
	TOTAL PROJECT CEILING	$650,000

REGIONAL ADMINISTRATOR RECOMMENDATION

Conditions at the West Bank Asbestos Site meet the NCP Section 300.65 criteria for an immediate removal and/or capping in that there is:

- o Potential exposure to hazardous substances...by nearby populations...[300.65(b)(2)(i)];
- o High levels of hazardous substances...in soils largely at or near the surface, that may migrate [300.65(b)(2)(iv)];
- o Weather conditions that may cause hazardous substances... to migrate or be released [300.65(b)(2)(v)];
- o Other situations or factors which may pose threat to public health, welfare, or environment (downstream migration of asbestos) [300.65(b)(2)(viii)];
- o Drainage controls...--where precipitation or run-off from other sources...may enter the release area from other areas [300.65(c)(2)]; and
- o Capping of contaminated soils...--where needed to reduce migration of hazardous substances...into soil, groundwater or air [300.65(c)(4)].

I therefore recommend your approval of this removal request. The estimated total project costs are $650,000, of which $610,000 is for extramural cleanup contractor costs. You may indicate approval or disapproval by signing below.

Approve: Paul Keough Date: 3-23-87

Disapprove: _____ Date: _____